

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

IN RE:

DONITA L. CROW,

Case No. 18-12526

Debtor.

STIPULATION BETWEEN TRUSTEE AND DEBTOR RESOLVING TRUSTEE'S
OBJECTION TO DEBTOR'S CLAIM OF EXEMPTIONS

NOW COMES James V. Block, as Trustee and the Debtor, Donita Crow, by and through her attorney, Matthew Lien, Lien Law Offices, who states to the Court their agreement as follows:

1. This Chapter 7 case was filed on July 26, 2018 and Christopher M. Seelen was appointed as Trustee. Trustee Seelen since has rejected the case and James V. Block was appointed Trustee.
2. The Debtor has claimed the following exemption, among others:

<u>Asset</u>	<u>Exemption</u>
TLA/RESPA claim against Fay Servicing and Wells Fargo ("Asset")	\$12,805 – 11 U.S.C. § 522(d)(5)
3. The Trustee objected to the Debtor's exemption in the Asset to the extent the Asset is worth more than \$12,805.
4. The Trustee and the Debtor have now reached a resolution of this matter.
5. The Asset shall be exempt in the amount of \$12,805.
6. Any net recovery by the Debtor on the Asset in excess of \$12,805 is not exempt, is property of the Bankruptcy Estate, and is not administratively abandoned.
7. Once any recovery is received by the Debtor, the Debtor within 10 business days of receipt of any recovery shall do the following:
 - a) Inform Trustee James Block in writing and by email of the amount of the total recovery and how the net recovery is calculated by

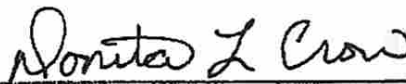
sending a written letter to James V. Block, 3544 Stewart Ave, Wausau, WI 54401 and email to jim@krautkramerbblock.com,

- b) Inform the U.S. Trustee's office in writing of the amount of the total recovery and how the net recovery owed to the bankruptcy estate is calculated by sending a written letter to U.S. Trustee, 780 Regent St # 304, Madison, WI 53715,
 - c) The Debtor shall pay to the Trustee by attorney trust account check, cashier's check, or money order any net recovery in excess of \$12,805.00. The payments shall be made out to "Trustee James V. Block for the Bankruptcy Estate of Donita L. Crow 18-12526" and sent to Trustee James Block, 3544 Stewart Ave, Wausau, WI 54401, and
 - d) File amended schedules to disclose any recovery with the Bankruptcy Court.
8. The Trustee may contact the Debtor's attorney Matt Lein, or the Debtor, if later unrepresented, at any time with respect to requesting an update as to the status of the recovery.
9. That a no asset report may be filed and the bankruptcy case may be closed, but that it may be reopened at any time to administer the Asset.
10. Signatures that are faxed, scanned in, and emailed to counsel shall be accepted as originals.

NOW THEREFORE, the parties request an Order as follows:

- A. Approving this Stipulation; and
- B. For such other and further relief as the Court in its discretion deems just and equitable under the circumstances.

Dated at this 1 day of NOV, 2018.



Donita L. Crow


Dated at this 6 day of November, 2018.

Lein Law Offices



Matthew C. Lein
Attorney for Debtor
15692 N Highway 63
P. O. Box 761
Hayward, WI 54843
(715) 634-4273

Dated at this 6th day of November, 2018.



Trustee James V. Block
3544 Stewart Ave
Wausau, WI 54401
(715) 842-2162